

ORIGINAL

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

THE UNITED STATES OF AMERICA,

Plaintiff,

vs

Case:2:19-cr-20486
Judge: Edmunds, Nancy G.
MJ: Majzoub, Mona K.
Filed: 07-17-2019 At 03:20 PM
INFO USA V DOOLIN (af)

D-1 MICHELE R. DOOLIN,

Defendant.

I N F O R M A T I O N

THE UNITED STATES ATTORNEY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this Information:

1. Becker Orthopedic was a medical orthotics company located in Troy, Michigan.
2. During the period from approximately 2011, up to May 2015, Becker Orthopedic maintained a checking account at Chase Bank, Troy, Michigan.
3. During the period from May 2015 up to December 2017, Becker

Orthopedic maintained a checking account at PNC Bank, Troy, Michigan.

4. Chase Bank and PNC Bank were financial institutions as defined by 18 U.S.C. §20.

5. Defendant MICHELE R. DOOLIN was employed by Becker Orthopedic, in the accounts payable department.

6. As a part of her duties, defendant MICHELE R. DOOLIN was authorized to prepare checks on behalf of Becker Orthopedic for the limited purpose of payment of certain outstanding company obligations.

COUNT ONE
18 U.S.C. §1344 –
Financial Institution Fraud

D-1 MICHELE R. DOOLIN

The General Allegations are included in this Count.

7. Beginning in or about 2011, and continuing up to and including December 2017, in the Eastern District of Michigan, Southern Division, defendant MICHELE DOOLIN engaged in a scheme to obtain money and funds that were under the custody and control of a financial institution, and did so by means of material false and fraudulent

pretenses and representations; that is, defendant MICHELE DOOLIN, without authorization, periodically issued checks to herself and to petty cash from the Becker Orthopedic checking accounts at Chase Bank and PNC Bank. Defendant MICHELLE DOOLIN signed the checks by using the signature stamp of the company controller, without authorization. MICHELE DOOLIN cashed the checks and converted the proceeds to her own use. Defendant MICHELE DOOLIN concealed the fraud by making false entries in corporate bookkeeping records.

8. In violation of Title 18, United States Code, Section 1344.

FORFEITURE ALLEGATIONS
18 U.S.C. § 982(a)(2)(A)

9. The allegations alleged in Count One of this Information are hereby re-alleged and incorporated by reference for purposes of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A).

10. Upon conviction of the offense set forth in Count One of this Information, the defendant shall forfeit to the United States any property constituting, or derived from, proceeds she obtained, directly or indirectly, as the result of such violation.

11. Such property includes, but is not limited to, a forfeiture money judgment against the defendant in an amount to be determined, representing the total value of all property subject to forfeiture.

12. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

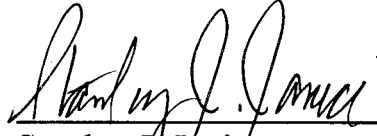
the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to forfeit any property of such defendant up to the value of the forfeitable property described above.

Respectfully submitted,

MATTHEW SCHNEIDER
United States Attorney



John K. Neal
Chief, White Collar Crimes Unit



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July 17, 2019

United States District Court
Eastern District of Michigan

Criminal Case Cover Sheet

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete this form.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

Case Title: USA v. Michelle R. Doolin

County where offense occurred : Oakland

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☒ Information --- no prior complaint.

☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]

☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

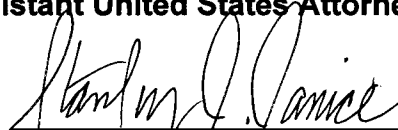
Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

July 17, 2019

Date



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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.